

# **Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (SCC)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER GRANTING MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE  
QUESTIONNAIRES PURSUANT TO SECTION 107(A) OF THE BANKRUPTCY CODE**

Upon the Motion For an Order To Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code,<sup>1</sup> dated March 19, 2015 of Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, and on behalf of its affiliates (collectively, “Lehman”), together with the Official Committee of Unsecured Creditors (the “Creditors Committee,” and together with Lehman “Movants”); and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, Loretta C.J.); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the motion having been provided in accordance with the procedures set forth in the Second Amended Order Implementing Certain Notice and Case Management Procedures entered June 17, 2010 [Dkt. No 9635] (the “Case Management Order”) to (i) the United States Trustee for the Southern District of New York; (ii) the attorneys for the Official Committee of Unsecured Creditors; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) all parties who have requested notice in these chapter 11 cases; and all parties who

---

<sup>1</sup> Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed thereto in the motion.

previously submitted a Derivative Questionnaire, and it appearing that no other or further notice need be provided; and the Court having reviewed and considered the motion and any exhibits filed in support thereof; and the Court having held a hearing on **April 8, 2015**; and no objections or other responses having been filed thereto that have not been overruled, withdrawn, or otherwise resolved; and the Court having determined that the relief sought in the motion is in the best interest of all parties in interest and that the legal and factual bases set forth in the motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore; it is

ORDERED that the Motion is granted with the modification that Movants shall redact all identifying information concerning the source of any Derivative Questionnaires before disclosing documents to litigation adversaries; and it is further

ORDERED that, notwithstanding anything to the contrary in the Bar Date Order, and with the modification set forth in the preceding paragraph, Movants are authorized to use and produce the redacted Derivative Questionnaires as discovery materials in any Lehman-related adversary proceeding or claim objection; and it is further

ORDERED that in the event information contained in the redacted Derivative Questionnaires is subsequently filed with the Court, such information shall not be entitled to sealed treatment; and it is further

ORDERED that this Order shall be effective and enforceable immediately upon entry; and it is further

ORDERED that this Court retains jurisdiction to resolve any disputes arising under or related to this Order, including any discovery disputes that may arise between Movants and the Litigation Claimants, and to interpret, implement, and enforce the provisions of this Order.

Dated: \_\_\_\_\_, 2015  
New York, New York

---

HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE